



Association for Postal Commerce

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November 23, 2011

Ms. Becky Dobbins
Manager, Product Classification
U.S. Postal Service
475 L'Enfant Plaza, SW., Room 4446
Washington, DC 20260-5015

Re: Proposed Rule, New Standards for Domestic Mailing Services, CFR Vol 76 No. 205, 65640-65653

Dear Ms. Dobbins:

We are writing regarding the USPS' proposed rules concerning New Standards for Domestic Mailing Services, published by the USPS in the *Federal Register* on October 24, 2011. Our position is based on the careful evaluation of the proposed rules by our large membership, which is comprised of direct marketing firms, printers, lettershops, suppliers, and others who either use or support the use of mail for business communication and commerce.

Clarification Needed

PostCom members have requested additional information/clarification on these elements of the proposed rules:

- **Intelligent Mail Barcode (IMb) Full-Service Discount.** Due to the manner in which the USPS presented the DMCS changes in its pricing filing, there is some confusion as to whether any changes were proposed to the Intelligent Mail barcode (IMb) Full-Service Discount, particularly for Standard Mail automation letters. Clarification would be helpful.
- **Confirm Service Changes.** PostCom members have many questions about the changes the USPS is proposing for the Confirm service. When will the existing Confirm service be discontinued and what are the options for mailers currently subscribing to the service? How will current subscribers be notified? What options will remain for mailers to obtain piece-level scan data as provided today in Confirm? Will IMb data be provided to both Basic IMb users and Full-Service IMb users? How will the future service differ between Basic and Full-Service IMb users? What will the companies who have MIDs linked to Confirm receive? For the new IMb Tracing service, will mailers still have the option of having data files "pushed" to them vs. having to "pull" their scan data?

The USPS needs to detail how the existing program will be eliminated, what the new program will provide, how mailers transition between the two, and as much information as possible on what the new service will include so that mailers can plan the necessary changes.

- **Non-Machinable Standard Mail Letter Presort Categories.** In the USPS' pricing filing,.... it is not clear that there is no Mixed AADC DSCF entry allowed for non-machinable Standard Mail letters weighing over 3.3 ounces. The chart shown in Appendix A, Page 33 top, MCS 1220.6a&b) show per piece and per pound prices for Mixed AADC DSCF entry but this category had previously been eliminated. Please clarify.

- **Parcel Barcode Discounts.** Please clarify what is being proposed in terms of barcode discounts for parcel categories within the market dominant product group. It appears that the barcode discounts for single piece and basic machinable Media Mail parcels, and for Bound Printed Matter (BPM) machinable parcels are being eliminated. Please clarify.
- **Bound Printed Matter Flats Barcode Discount.** Please clarify whether the barcode discount for Bound Printed Matter (BPM) automation-compatible flats remains in place and, if so, whether the pricing of that discount will change.
- **Standard Mail Carrier Route Basic Letters.** There is some confusion around the fact that the same prices apply to both automation and non-automation Standard Mail Carrier Route Basic letters. It would be helpful if the USPS would clarify this in its final rules.
- **Maximum Weight for Carrier Route Pieces.** The USPS in its pricing filing in Appendix A, shows a change in the maximum weight for Standard Mail Carrier Route letters from the current 3.5 ounces to "less than 16 ounces" (MCS 1215.2). There does not appear to be a reference to what this change means in the proposed mailing standards. Please clarify.
- **Negative Price Cell.** In calculating the piece/pound rates for Nonprofit Standard Mail Automation 5-digit letters weighing between 3.3 ounces and 3.5 ounces, it comes out to -0.2 cents (a negative amount). Is this correct? Please clarify.
- **Mailpiece Design Requirements for Flats.** There is confusion as to which mailpiece design requirements apply to automation-compatible flats only and which requirements apply to all flats. Mailers currently use "fletter" designs to achieve lower postage rates, but it looks as though these pieces would have to be mailed as Marketing Parcels under the new pricing structure and mailpiece design requirements. Clarification is needed. Can pieces still be mailed as flats which are 5x6" with maximum thickness up to $\frac{3}{4}$ "?
- **Package Intercept Service.** The USPS in its pricing filing includes a new "Package Intercept Service," but no information on what the service entails or the eligibility requirements is included in the pricing filing or the proposed mailing standards. Please detail this information in the final rules.
- **NFM/Parcel Categories.** The USPS in its pricing filing and proposed mailing standards includes the elimination of the Not Flat-Machinable (NFM) category. We appreciate the advance notice the USPS has given about the elimination of this category, but there is confusion in the industry as to the options under the new pricing structure and mailing standards for pieces that previously fit into the NFM category. Please detail what products these pieces could qualify for without making changes in mailpiece dimensions or characteristics under the new pricing structure. What efforts is the USPS making to communicate with these mailers and advise them of their options?

Conclusion

PostCom urges the Postal Service to provide additional detail on the items listed above in order to minimize confusion as mailers prepare for the January 2012 pricing change and associated changes in mailing standards. We hope that the USPS will continue to work closely, openly and collaboratively with industry on the formulation of mailing standards such as these.

We appreciate this opportunity to provide the USPS with feedback from our members on its proposed rules. If you have any questions, please do not hesitate to contact me.

Sincerely,

A handwritten signature in black ink, appearing to read "Gene Del Polito". The signature is written in a cursive, flowing style with a large initial "G".

Gene Del Polito
President